

Exhibit D

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re Lehman Brothers Holding Inc., et al.,

Debtor,

Case Number 08-13555(JMP)

**RGM TRADING INTERNATIONAL LIMITED'S RESPONSES
AND OBJECTIONS TO SUBPOENA FOR RULE 2004 EXAMINATION**

Pursuant to Rules 45 of the Federal Rules of Civil Procedure and Fed. R. Bankr. P. 9016 RGM Trading International Limited ("RGM") objects to Debtor Lehman Brothers Holding Inc.'s ("Lehman" or "Debtor") Subpoena for Rule 2004 Examination dated December 17, 2012:

GENERAL OBJECTIONS AND RESERVATIONS

RGM makes the following General Objections and Reservations:

1. RGM objects to each request to the extent that it seeks information protected from disclosure by the attorney-client privilege, work product immunity, Fed. R. Civ. P. 26, and/or any other applicable privilege or protection afforded by law. Inadvertent production of such documents shall not be deemed a waiver of any applicable privilege or immunity.
2. RGM objects to Lehman's definitions, instructions, and topics to the extent that they seek to impose greater requirements than those contained in Rules 26, 30 and 45 of the Federal Rules of Civil Procedure, the Local Rules of Practice of the Southern District of New York, or any standing orders of the Court.
3. RGM objects to each request to the extent it seeks information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.
4. RGM objects to each request to the extent it contains no limitation on the time

period for which responsive information is sought and therefore is burdensome, oppressive, overly broad and not reasonably calculated to lead to the discovery of admissible evidence.

5. RGM objects to each request to the extent it seeks a legal conclusion.

6. RGM objects to each request to the extent it seeks information or documents that are not within the possession, custody, or control of RGM, or its present employees, officers, directors, or agents. RGM reserves the right to refuse to provide information that is not within its possession, custody or control. For the same reasons, RGM objects to Lehman's definition of "You" and "Your" to the extent that the definition includes entities other than RGM Trading International Limited or its present employees, officers, directors, or agents.

7. RGM objects to each request to the extent it is overly broad, vague, confusing, or ambiguous. RGM further objects to each request to the extent it is vague and/or fail to describe the item or category of document requested with reasonable particularity.

8. RGM objects to each request to the extent Lehman seeks to require RGM to provide information beyond what is available to RGM from a reasonable search of its own files and from a reasonable inquiry of its present employees.

9. RGM objects to each request to the extent it seeks disclosure of information subject to the rights of third parties not affiliated with RGM. In particular, RGM objects to this request to the extent that such disclosure is prohibited by the terms of any obligations of confidentiality between RGM and third parties.

10. RGM objects to each request to the extent it seeks information unavailable to RGM and/or information already within Lehman's possession, custody, or control.

11. RGM objects to each request to the extent that it may be read as requiring the use of unreasonably burdensome or expensive data recovery processes.

RGM makes the foregoing General Objections to each and every topic whether or not specifically stated in objecting thereto. To the extent specific objections are set forth in objecting to a particular topic, those specific objections are set forth because they are believed to be particularly applicable to the specific topic and are not to be construed as a waiver of any General Objection applicable to such topic. RGM reserves the right to amend and supplement its General and Specific Objections.

SPECIFIC OBJECTIONS

REQUEST NO. 1:

1. All documents that show how and when and the circumstances under which you or a Prior Holder learned of or obtained, received or otherwise gained possession of the Guaranty Document.

SPECIFIC OBJECTIONS TO REQUEST NO. 1:

RGM objects to this request as overly broad. RGM further objects to this topic to the extent it seeks documents subject to the attorney-client privilege and/or work product doctrine. RGM further objects to this request to the extent that it assumes there were Prior Holders, which there were not. Subject to, and without waiving, the foregoing objections, after conferring with Debtors' counsel, RGM has produced RGM 0001- RGM 0092. RGM has further offered to provide native files of these documents upon request.

REQUEST NO. 2

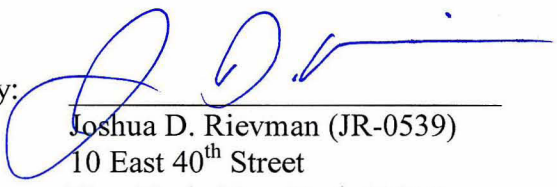
2. All documents that would support or relate to any claim that You or a Prior Holder relied upon an alleged Guaranty in connection with any transaction with the Primary Obligor.

SPECIFIC OBJECTIONS TO REQUEST NO. 2:

RGM objects to this request as irrelevant, vague, ambiguous and overly broad. RGM further objects to this request to the extent that it seeks a legal conclusion. RGM further objects to this request to the extent it seeks documents subject to the attorney-client privilege and/or work product doctrine. RGM further objects to this request to the extent that it assumes there were Prior Holders, which there were not. Subject to, and without waiving, the foregoing objections, after conferring with Debtors' counsel, RGM has produced RGM 0001- RGM 0092. RGM has further offered to provide native files upon request.

Dated: New York, New York
January 16, 2013

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